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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

DAMIAN KARL SCHENEWARK,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 1:25-cv-00617-SKO

**STIPULATION & UNOPPOSED MOTION  
FOR EXTENSION OF TIME; ORDER**

(Doc. 19)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 50 days, from November 24, 2025 to January 13, 2026, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions, organizational changes, and the recent

lapse in appropriations funding federal agencies including the Social Security Administration, the undersigned counsel for the Commissioner has many pressing deadlines from the resulting backlog of cases requiring reassignment, extension, and briefing. Additionally, the undersigned is scheduled to be out of the office on leave during the first week of December. Despite diligent efforts to manage her workload, counsel for the Commissioner needs additional time in the instant case to review the substantial administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: November 18, 2025

PENA AND BROMBERG, PC

By: /s/ Dolly M. Trompeter\*

DOLLY M. TROMPETER

Attorneys for Plaintiff

[\*As authorized by J. Pena on Nov. 18, 2025]

Dated: November 18, 2025

ERIC GRANT

United States Attorney

MATHEW W. PILE

Head of Program Litigation 1

Social Security Administration | Law & Policy

By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

### **ORDER**

Pursuant to the parties' stipulation and unopposed motion, (Doc. 19), and for good cause shown, *see* Fed. R. Civ. P. 16(b)(4), IT IS ORDERED that Defendant shall have an extension, up to and including January 13, 2026, to respond to Plaintiff's Motion for Summary

1 Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the  
2 Commissioner's Cross-Motion.

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4 IT IS SO ORDERED.

5 Dated: November 18, 2025

/s/ Sheila K. Oberto  
6 UNITED STATES MAGISTRATE JUDGE  
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